

UNITED STATES COURT OF APPEALS  
DISTRICT OF COLUMBIA CIRCUIT

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800 RIVER ROAD OPERATING COMPANY  
LLC D/B/A WOODCREST HEALTH CARE  
CENTER,

Petitioner,

v.

No. 15-1204

NATIONAL LABOR RELATIONS BOARD,

Respondent.

DECLARATION OF  
KATHERINE H. HANSEN  
IN SUPPORT OF  
MOTION FOR  
LEAVE TO INTERVENE

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1. I am associated with the firm of Gladstein, Reif & Meginniss, LLP, counsel to 1199 SEIU United Healthcare Workers East (“1199 SEIU” or “the Union”). I was admitted to practice before the United States Court of Appeals District of Columbia Circuit in 2015 and am a member in good standing. I submit this declaration in support of 1199 SEIU’s motion for leave to intervene in this matter.

2. Respondent National Labor Relations Board (“Respondent”), has cross-applied for application of its order reported at 362 NLRB No. 114 (2015), in which the NLRB ordered Petitioner to, *inter alia*, recognize and bargain with the Union, and to furnish the Union with the information it requested.

3. 1199 SEIU, a labor organization, was the charging party in the underlying unfair labor practice proceeding at the NLRB, and participated in the proceeding.

4. The NLRB's Decision and Order directly affects the Union, as it has been certified by the NLRB as the exclusive collective bargaining representative of Petitioner's non-professional employees.

5. I am fully familiar with all the facts and issues presented in this matter, as this firm litigated the representation case underlying the unfair labor practice proceeding on behalf of the Union. This firm also handled the unfair labor practice proceeding on behalf of the Union.

6. The Union moves to intervene in support of the NLRB's Decision and Order. The NLRB consents to the Union's intervention.

Dated: New York, New York  
August 24, 2015

/s/ Katherine H. Hansen  
Katherine H. Hansen

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